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November 18, 2021

BY ECF

Hon. Analisa Torres
United States District Judge
United States Courthouse
40 Foley Square
New York, NY 10007

Re: *United States v Shalik Jenkins*, 20 Cr. 78 (AT)

Your Honor:

I represent Shalik Jenkins in the referenced case and write to request a modification of the conditions of his release. Specifically, we ask that: (1) the condition of home detention be removed and replaced with a condition of curfew, with hours to be set at the discretion of Pretrial Services (and electronic monitoring to remain); and (2) that the travel restrictions be modified to the extent of permitting Mr. Jenkins to travel to the District of New Jersey,

The reason for this request is to enable Mr. Jenkins to accept a full-time job as a “drive associate” with a company affiliated with Amazon. From approximately the time of his release on bail until earlier this month, Mr. Jenkins had been employed at a temporary agency. A couple of days ago, Mr. Jenkins was offered this position (with the understanding that employment would commence on November 22, 2021). This job entails occasional trips into New Jersey.

Pretrial Services Officer Mohammed Ahmed has informed me that such employment could not be undertaken under home detention, insofar as it involves moving to different locations (including New Jersey) with somewhat variable hours. But he also made it clear that Mr. Jenkins has been in full compliance with all conditions of his release by reporting regularly, maintaining employment to the best of his ability, and otherwise being fully cooperative with his office. Accordingly, Officer Ahmed has suggested that the most practical approach would be to change Mr. Jenkins’ conditions to curfew, with hours to be set at the discretion of Pretrial Services, and also

amend the travel restrictions to permit travel to New Jersey. I have informed AUSA Andrew Chan of the situation and he has indicated to me that the government consents to this application, conditioned on Mr. Jenkins maintaining employment that is verifiable by Pretrial Services..

For these reasons, we ask that this Court grant the requested relief.

Respectfully submitted,

s/s
James E. Neuman

GRANTED.

SO ORDERED.

Date: November 19, 2021
New York, New York



ANALISA TORRES
United States District Judge